



**DEPARTMENT OF THE ARMY**  
**U.S. ARMY CORPS OF ENGINEERS**  
WASHINGTON, D.C. 20314-1000

REPLY TO  
ATTENTION OF:

CEMP-CE

SEP 30 2004

**MEMORANDUM FOR SEE DISTRIBUTION**

**SUBJECT: Hazardous, Toxic and Radioactive Waste (HTRW) Chemical Data Quality Management Policy for Environmental Laboratory Testing**

1. Reference: DASA (ESOH) Memorandum dated 11 July 2001, subject: Army Implementation of DOD Quality Systems Manual for Environmental Laboratories (Encl. 1)
2. In order to comply with the reference, USACE districts are directed to specify the most recently published version of the DOD Quality Systems Manual (QSM) in their contracts. (See Encl. 2) Since the DOD QSM incorporates requirements of the National Environmental Laboratory Accreditation Conference (NELAC) Standard, Chapter 5, NELAC compliance will also be a component of this policy. This policy will replace current contractual requirements for USACE Environmental Laboratory Validation. Districts will immediately amend existing contracts, or in issuing new contracts, require that all commercial environmental laboratories supporting USACE environmental projects perform in accordance with the DOD QSM including the NELAC Chapter 5 component. In addition, it is strongly recommended that actual NELAP accreditation, for appropriate fields-of-testing, be contractually required as the most efficient/economical mechanism for a district to verify laboratory compliance with the NELAC standard. (See Encl. 2 for appropriate contractual language.) It should be noted that laboratory participation in the NELAC Standard Proficiency Testing Program is a requirement under either contractual scenario. A laboratory holding an unexpired USACE Environmental Laboratory Validation will be grandfathered as meeting the new policy, until such time as their validation term expires. The latest version of the DOD QSM is available at [www.denix.osd.mil](http://www.denix.osd.mil). Information on an individual lab's NELAP accreditation is available from the NELAC website (<http://www.epa.gov/nlerlesd1/landsci/nelac/index.html>), the Primary and Secondary State Accrediting Authorities, and/or the environmental laboratories themselves.
3. The primary responsibility for determining the compliance of environmental testing labs with this policy, rests with the PM district and members of the PDT (e.g. district chemist). It is suggested that districts institute an evaluation mechanism of "documented self declaration, by the laboratories, for compliance with the DOD QSM. (See Encl. 3 for laboratory self-declaration form.) Upon implementation of this policy the HTRW CX will transition to a technical assistance role in support of districts, in all aspects of compliance with this policy (e.g. evaluation of laboratory self-declaration); in addition to providing complementary compliance support activities (e.g. additional desk audits, on-site inspections, data review etc). Upon implementation of this policy the Lab List

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previously maintained by the CX on the intranet, will no longer be updated, since no new USACE Environmental Laboratory Validations will be issued. (See Encl. 4 for roles and responsibilities of District, MSC, and CX staff.) Note, project specific funding may be necessary for the HTRW CX to support certain requests for technical assistance. Resources for technical assistance from the HTRW CX should be accounted for when establishing projects in the P2 system.

4. My point-of-contact is Dr. David Koran at (202) 761-0076.

FOR THE COMMANDER:



ENCLS

PATRICIA A. RIVERS, P.E.  
Chief, Environmental  
Community of Practice  
Directorate of Military Programs

DISTRIBUTION:

COMMANDER, U.S. ARMY ENGINEER DIVISION, GREAT LAKES AND OHIO RIVER

COMMANDER, U.S. ARMY ENGINEER DIVISION, MISSISSIPPI VALLEY

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COMMANDER, U.S. ARMY ENGINEER TRANSATLANTIC PROGRAM CENTER, WINCHESTER

CF:

COMMANDER, U.S. ARMY ENGINEER DISTRICT, BUFFALO

COMMANDER, U.S. ARMY ENGINEER DISTRICT, CHICAGO

COMMANDER, U.S. ARMY ENGINEER DISTRICT, DETROIT

COMMANDER, U.S. ARMY ENGINEER DISTRICT, HUNTINGTON

COMMANDER, U.S. ARMY ENGINEER DISTRICT, LOUISVILLE

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CF (cont.):

COMMANDER, U.S. ARMY ENGINEER DISTRICT, MEMPHIS  
COMMANDER, U.S. ARMY ENGINEER DISTRICT, NEW ORLEANS  
COMMANDER, U.S. ARMY ENGINEER DISTRICT, ROCK ISLAND  
COMMANDER, U.S. ARMY ENGINEER DISTRICT, ST. LOUIS  
COMMANDER, U.S. ARMY ENGINEER DISTRICT, ST. PAUL  
COMMANDER, U.S. ARMY ENGINEER DISTRICT, VICKSBURG  
COMMANDER, U.S. ARMY ENGINEER DISTRICT, BALTIMORE  
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COMMANDER, U.S. ARMY ENGINEER DISTRICT, NEW YORK  
COMMANDER, U.S. ARMY ENGINEER DISTRICT, NORFOLK  
COMMANDER, U.S. ARMY ENGINEER DISTRICT, PHILADELPHIA  
COMMANDER, U.S. ARMY ENGINEER DISTRICT, KANSAS CITY  
COMMANDER, U.S. ARMY ENGINEER DISTRICT, OMAHA  
COMMANDER, U.S. ARMY ENGINEER DISTRICT, PORTLAND  
COMMANDER, U.S. ARMY ENGINEER DISTRICT, SEATTLE  
COMMANDER, U.S. ARMY ENGINEER DISTRICT, WALLA WALLA  
COMMANDER, U.S. ARMY ENGINEER DISTRICT, ALBUQUERQUE  
COMMANDER, U.S. ARMY ENGINEER DISTRICT, LOS ANGELES  
COMMANDER, U.S. ARMY ENGINEER DISTRICT, SACRAMENTO  
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COMMANDER, U.S. ARMY ENGINEER DISTRICT, FORT WORTH  
COMMANDER, U.S. ARMY ENGINEER DISTRICT, GALVESTON  
COMMANDER, U.S. ARMY ENGINEER DISTRICT, LITTLE ROCK  
COMMANDER, U.S. ARMY ENGINEER DISTRICT, ALASKA  
COMMANDER, U.S. ARMY ENGINEER DISTRICT, FAR EAST  
COMMANDER, U.S. ARMY ENGINEER DISTRICT, HONOLULU  
COMMANDER, U.S. ARMY ENGINEER DISTRICT, JAPAN

CF:

CECW-E (Basham)  
CECW-LRD (White)  
CECW-SAD (Wilson)  
CECW-EW (Shepp)  
CENWO-HX (Davies)  
CENWO-HX-C (Coats)  
CEERD-EP-C (Taggart)



DEPARTMENT OF THE ARMY  
OFFICE OF THE ASSISTANT SECRETARY  
INSTALLATIONS AND ENVIRONMENT  
110 ARMY PENTAGON  
WASHINGTON DC 20310-0110  
July 11, 2001

EQ \_\_\_\_\_

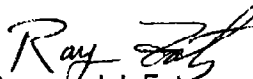
MEMORANDUM FOR DEPUTY UNDER SECRETARY OF DEFENSE  
(INSTALLATIONS & ENVIRONMENT)

SUBJECT: Army Implementation of Department of Defense (DoD) Quality  
Systems Manual for Environmental Laboratories

Reference your memorandum dated December 05, 2000, subject: DoD  
Quality Systems Manual for Environmental Laboratories.

Enclosed for your consideration is the Army's plan to implement the DoD  
Quality Systems Manual for Environmental Laboratories. An Army work group  
consisting of the U.S. Army Environmental Center (AEC), the U.S. Army Center  
for Health Promotion and Preventive Medicine, and the U.S. Army Corps of  
Engineers has developed this plan.

My point of contact (POC) for this issue is Mr. Rick Newsome, (703) 614-  
9531. The AEC POC is Mr. Douglas Scarborough at (410) 436-1514 and the  
Office of the Director for Environmental Programs POC is Ms. Karen Wilson at  
(703) 697-0338.

  
Raymond J. Fatz

Deputy Assistant Secretary of the Army  
(Environment, Safety and Occupational Health)  
OASA(I&E)

Enclosure

**ARMY PLAN TO IMPLEMENT THE DEPARTMENT OF DEFENSE'S  
QUALITY SYSTEMS MANUAL (QSM) FOR ENVIRONMENTAL  
LABORATORIES  
June 2001**

**U.S. Army Center for Health Promotion and Preventive Medicine  
(USACHPPM)**

1. Will implement the QSM at internal labs NLT **1 Oct 01**.
2. Will implement the QSM for contracted lab services in all contracts awarded after **1 Oct 01**, to be completed NLT 31 Dec 02.

**U.S. Army Corps of Engineers (USACE)**

1. Will implement the QSM at internal labs NLT **1 Jan 02**.
2. Will implement the QSM in contracts for lab support at internal labs in all contracts awarded after **1 Oct 01**, to be completed NLT 1 Oct 06.
3. Will implement the QSM in contracts for environmental lab services in all contracts awarded after **1 Oct 01**, to be completed NLT 1 Oct 03.
4. Will implement the QSM in A&E contracts for environmental work in all contracts awarded after **1 Oct 01**, to be completed NLT 1 Oct 06.

**Installations labs and contracted lab services**

**NOTE:** This plan is contingent upon sufficient funding from a mixed restoration/compliance account to be established.

1. Notification to MACOMS through memo from ACSIM, NLT **1 Oct 01**.
2. Training and outreach workshop for MACOMS, **1 Jan 02 to 31 Mar 02**.
3. Regional training and outreach workshops for installations, **1 Jun 02 to 31 Dec 02**.
4. Establish and operate helpdesk (contractor or USACE CX) **1 Jun 02 through 1 Jun 07**.
5. Installation labs to implement QSM NLT **1 Jul 03**.
6. Installation lab contracts and procurement activities to implement the QSM for all procurement actions starting **1 Jul 03** and completed NLT 1 Oct 06.

**ENCLOSURE 1**

**REVISED CONTRACTUAL LANGUAGE:** Any requirements for USACE Environmental Laboratory Validation are to be removed from contracts. All contracts for direct or subcontract environmental laboratory services are to include verbiage A or B as appropriate:

A. Contract not requiring NELAP Accreditation– “Environmental laboratory services are to be provided only by laboratories compliant with the most recently published version of the DOD Quality Systems Manual (QSM) (including the NELAC Standard Chapter 5 and Appendix requirements), including requirements for successfully analyzing Proficiency Testing samples. As requested by the COR, the laboratory shall submit, in a timely manner, the self-declaration forms, and supporting documentation, accurately reflecting laboratory operations. Before testing services can be performed by the laboratory, the COR will notify the candidate laboratory of the acceptability of the declaration and supporting documentation. Self-declaration is to be made annually. An environmental laboratory either anticipating, or engaged in support of USACE contracts, shall notify the prime contractor and COR, immediately of change in status of laboratory operations that may affect on-going compliance with these requirements. The USACE COR may, at any time, conduct audits (including requests for pertinent data or information) that support an environmental laboratory’s self-declaration of compliance with this policy. If the COR finds the laboratory non-compliant; alternate, compliant laboratory services will be utilized, until such time as compliance is again demonstrated. Before performing environmental testing for USACE, the laboratory shall have access to the approved Quality Assurance Project Plan.”

B. Contracts requiring NELAP Accreditation– “Environmental laboratory services are to be provided only by laboratories compliant with the most recently published version of the DOD Quality Systems Manual (QSM) and holding a current NELAP accreditation for all appropriate fields-of-testing. As requested by the COR, the laboratory shall submit, in a timely manner, the self-declaration forms (including supporting documentation), as well as information related to NELAP accreditation. Before testing services can be performed by the laboratory, the COR will notify the candidate laboratory of the acceptability of the declaration and supporting documentation. Self-declaration, and provision of NELAP accreditation information is to be provided annually while supporting USACE contracts. An environmental laboratory either anticipating, or engaged in support of USACE contracts, shall notify the prime contractor and COR, immediately of change in status of laboratory operations that may affect on-going compliance with these requirements. The USACE COR may, at any time, conduct audits (including requests for pertinent data or information) that support an environmental laboratory’s self-declaration of compliance with this policy. If the COR finds the laboratory non-compliant; alternate, compliant laboratory services will be utilized, until such time as compliance is again demonstrated. Before performing environmental testing for USACE, the laboratory shall have access to the approved Quality Assurance Project Plan.”

Note, some projects/contracts may need to specify additional state lab accreditations.

**ENCLOSURE 2**

**SELF DECLARATION FORM** – The following form is to provided to the candidate environmental laboratory by the COR, filled-out and returned by the laboratory (including required documentation, and evaluated by the COR for policy compliance before the laboratory can provide environmental analytical support to USACE contracts. Before testing services can be performed by the laboratory, the COR will notify the candidate laboratory of the acceptability of the declaration and supporting documentation. The form is to be updated on an annual basis.

Legal name of  
laboratory: \_\_\_\_\_

Street  
address: \_\_\_\_\_

Name of  
Owner: \_\_\_\_\_

Owner address  
(if different): \_\_\_\_\_

Phone number: \_\_\_\_\_

E-Mail  
address: \_\_\_\_\_

Laboratory  
director: \_\_\_\_\_

Phone number: \_\_\_\_\_

E-Mail  
address: \_\_\_\_\_

Quality  
Assurance Officer: \_\_\_\_\_

Phone number: \_\_\_\_\_

E-Mail  
address: \_\_\_\_\_

**ENCLOSURE 3**

The undersigned persons understand and acknowledge that:

a. Laboratory operations, which will be utilized for testing in support of environmental analytical testing for USACE, are in full compliance with the DOD Quality Systems Manual (Version 3), including NELAC Standard Chapter 5 and Appendix requirements). All written documentation provided to USACE, accompanying this declaration, accurately reflect policy/practices implemented by laboratory staff.

b. The Laboratory will notify USACE immediately of change in status of laboratory operations that may affect on-going compliance as declared per item a.

c. The Laboratory acknowledges that USACE may audit the laboratory, relative to policy compliance at any time deemed appropriate; and will allow a designated COR full access to information and facilities to conduct such audit operations.

d. Signatorees are authorized to sign this form on behalf of the owner and that there are no misrepresentations in the information provided in the initial laboratory assessment package.

**Signature of  
Quality Assurance Officer:** \_\_\_\_\_

**Date:** \_\_\_\_\_

**Signature of  
Laboratory Director:** \_\_\_\_\_

**Date:** \_\_\_\_\_

**Note** – A completed declaration form is to be accompanied by a copy of the laboratory's most current Quality Assurance Manual (including QA SOPs and Ethics program policies/procedures), appropriate sample prep and analytical SOPs, and corresponding performance data (MDL studies and LCS ranges) as well as documentation related to NELAP Accreditation(s), as appropriate.



## **ROLES/RESPONSIBILITIES FOR POLICY COMPLIANCE**

### **1. USACE District PM/PDT or COR**

a. Inclusion appropriate contract language (see Enclosure 2). Evaluation of contract proposal, and/or self-declaration forms with supporting documentation, for policy compliance by candidate environmental laboratory(ies). (Note this will achieve compliance with ER 1110-1-263.) Before testing services can be performed by the laboratory, the COR will notify the candidate laboratory of the acceptability of the declaration and supporting documentation.

b. Utilization of systematic planning process to develop DQOs and associated MQOs. Determine whether general performance of candidate lab will meet MQOs. Ensure approved QAPP (containing MQOs) is available to laboratory.

c. Evaluate ongoing compliance of laboratory, during project performance, with policy (e.g. NELAP accreditation). Review lab data, in accordance with QAPP.

d. Notify CX of lab usage.

e. Request technical assistance from CX, as necessary (e.g. evaluation of self-declaration forms and supporting documentation from candidate labs, information on laboratory NELAP accreditation status, evaluation of published methods not available as NELAC FOA, special/project-specific laboratory audits, and data review).

f. Report performance/policy compliance problems to CX, including evidence of misconduct.

### **2. USACE MSC**

a. Evaluate processes in place at assigned districts for policy implementation. Perform periodic audits to determine compliance with policy.

### **3. USACE HTRW CX**

a. Respond to all requests for technical assistance, including assessment published laboratory methods not accredited by a Primary NELAP Accrediting Authority, evaluation of laboratory self declaration, on-site inspections, desk audits, and data review.

b. Maintain USACE Environmental lab usage in "DOD" database.

c. Monitor laboratory assessment activities of other DOD components.

d. Participate in NELAC.